



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



470340

REPLY TO THE ATTENTION OF:

December 13, 2006

SR-6J

Via Certified Mail
Return Receipt Requested

Mr. Thomas Steib
Detrex Corporation
1100 N. State Road
Ashtabula, OH 44004

RE: Identification of Additional Deliverables / Work Items Required under Unilateral Administrative Order for Remedial Design / Remedial Action - Detrex Source Control Area - Fields Brook Superfund Site - Ashtabula, Ohio - Docket No. - V-W-98-C-450

Dear Mr. Steib:

Under the Unilateral Administrative Order (UAO) for Remedial Design / Remedial Action (RD/RA), Detrex Corporation (Detrex) is responsible for implementation of the remedy selected in the 1997 Source Control Record of the Decision. This work includes the construction, operation and maintenance of the Dense Non-Aqueous Phase Liquid (DNAPL) extraction system. Since installation of the first phase of wells, Detrex has experienced significant operational difficulties with the extraction wells and has since developed procedures and system modifications to address many of the technical hurdles encountered. In order to alleviate some of these problems as the system is expanded, Detrex has proposed an alternate extraction well design. U.S. EPA has determined that Detrex should move forward with the installation of additional extraction wells with the revised design and hereby requests that Detrex submit a work plan to U.S. EPA that addresses the installation and system connection details, a figure showing the placement of the new wells with a supporting rationale, a schedule for work, a revised Operations, Maintenance and Monitoring (OM&M) plan, and, if necessary, an update to the Health and Safety Plan. Because of Detrex's on-going work and weather considerations, Detrex should submit the identified documents to U.S. EPA within 75 days of receipt of this letter.

In addition to the work plan for the installation of additional extraction wells, U.S. EPA is also requiring that Detrex update its Quality Assurance Project Plan (QAPP) to address the methods and procedures to be used for sampling and analysis activities at the site. The QAPP should follow the new Uniform Federal Policy format, which is outlined at: <http://www.epa.gov/fedfac/documents/qualityassurance.htm>. As part of the QAPP, Detrex should address its sampling needs for both the current system OM&M and sampling that may be required to address additional DNAPL issues that relate to questions concerning the effectiveness and/or completeness of the current remedy. The QAPP should include procedures and methods for the analysis of groundwater, surface water, sediment, soils, and DNAPL samples. Detrex should submit a draft QAPP to U.S. EPA no later than 45 days after receipt of this letter. Please contact me as soon as possible to arrange a "pre-QAPP" conference call with a U.S. EPA chemist to review QAPP requirements.

If you have any questions concerning U.S. EPA's expectations regarding the work plan for installation of additional extraction wells and the new Uniform Federal Policy QAPP, please don't hesitate to contact me at 312-353-6564.

Sincerely,

A handwritten signature in black ink, appearing to read "Terese A. Van Donsel". The signature is fluid and cursive, with a large loop at the end.

Terese A. Van Donsel
Remedial Project Manager

cc: S. Jaffess / EPA-R5
P. Felitti / EPA-R5 ✓
T. Johnson / EPA-EPA Las Vegas
R. Williams / OEPA
T. Doll / Detrex
R. Currie / Detrex
M. Schmidt / URS
Site File - Fields Brook / Detrex